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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Develop an Electricity Integrated
Resource Planning Framework and to
Coordinate and Refine Long-Term
Procurement Planning Requirements.

Rulemaking 16-02-007

**ADMINISTRATIVE LAW JUDGE'S RULING SEEKING
COMMENT ON FILING REQUIREMENTS FOR
2020 INTEGRATED RESOURCE PLANS**

Summary

This ruling seeks comments from parties on the attached staff proposal modifying and clarifying the requirements for individual load serving entities (LSEs) required to file individual integrated resource plans (IRPs) in 2020.

Comments are due no later than October 14, 2019, with reply comments due no later than October 25, 2019.

1. Background on IRP Filing Requirements

Requirements for LSEs required to file individual IRPs were initially adopted by the Commission in Decision (D.) 18-02-018 for the first set of individual IRPs filed in 2018.

After review of the 2018 individual IRPs, Commission staff have identified several recommended modifications and clarifications to the filing requirements to ensure that the Commission has enough information in a useful form to assess and approve the individual IRPs, as well as to aggregate the LSE portfolios together to develop a proposed Preferred System Portfolio.

To facilitate this improvement based on experience from the first IRPs, Commission staff have prepared the attached staff proposal with recommendations for the filing requirements associated with individual IRPs due May 1, 2020. The staff proposal is a description of what LSEs will be required to provide in their individual IRPs, including the addition of new requirements and improvements to existing ones. It does not include the actual filing templates, which will be developed later in 2019.

2. Request to Parties

Parties are invited to file comments in response to the attached staff proposal. Parties may file comments on any aspect of the attachment but are requested to organize their comments in the order in which the topics appear in the attachment. To facilitate this input, following is a list of questions to which parties are requested to respond, as applicable. Parties need not respond to every question.

Questions related to Section 2: General rules and guidelines

1. Type of plan. Comment on the proposed changes to the type of plan that LSEs are eligible to file. Are there other changes, or modifications to the proposed changes, that should be considered?
2. Required and optional portfolios. Comment on the proposed changes to the required and optional portfolios for individual LSE filings. Are there changes, or modifications to the proposed changes, that should be considered?
3. Confidentiality. Comment on the proposed process to allow non-market participants access to the confidential version of filings by signing a standard non-disclosure agreement. If you do not agree with the proposal, propose an alternative method.

4. Other. Comment on any other aspect of Section 2 of the staff proposal.

Questions related to Section 3: Technical Requirements

5. Assigned load forecast. Comment on the proposal for assigning load forecasts to individual LSEs using the California Energy Commission's (CEC's) Integrated Energy Policy Report (IEPR).
6. Greenhouse gas (GHG) planning price. Comment on the proposal to eliminate the GHG planning price as an option to demonstrate compliance with the 2030 planning target.
7. GHG emissions benchmark. Comment on the proposal to apply the same methodology used in the previous IRP cycle to calculate the 2030 GHG emissions benchmarks for individual LSEs.
8. IRP planning standards. Comment on the proposal to introduce planning standards, or metrics, to be reported by LSEs. Do you see value in requiring LSEs to report on specific planning standards? Why or why not?
9. IRP planning standards. Should planning standards be informational in this IRP cycle? Should the Commission consider using the planning standards in a future citation program? Why or why not?
10. IRP planning standards. Do you agree with the areas identified for planning standards? Are there other relevant areas that should be considered for planning standard development?
11. Other. Comment on any other aspect of Section 3 of the staff proposal.

Questions related to Section 4: LSE Plan Components

12. Portfolio GHG results. Comment on the proposed planning standard for the GHG benchmark and make any recommendations for improvement.
13. Reported contracted and planned resources. Comment on the proposed differences in filing requirements for resources expected to be online in the medium term (by 2026) compared to those expected in the long term (2027-2030).
14. IRP and Renewables Portfolio Standard (RPS) Plan alignment. Do you have recommendations, beyond those already filed in the RPS rulemaking, regarding how to align the plans filed in IRP and RPS? Are there any examples of data tables that could be used to align the quantitative components of the two plans?
15. Local air pollutants. Comment on the proposed planning standard for local air pollutants and recommend any areas for improvement.
16. Disadvantaged communities. Comment on the planning standard for the focus on disadvantaged communities and recommend any areas for improvement.
17. Costs/rates. Do you agree with the proposal to assess the cost and rate impact of planned resources based on the 2019 Inputs and Assumptions used on the modeling for the Reference System Portfolio? If not, what other mechanism would you suggest and why?
18. Hydroelectric generation risk. Comment on the proposal to address the requirements of Decision (D.) 19-04-040 related to in-state drought risk. Are there improvements to how LSEs can plan and support efforts to manage this system-level risk?
19. Hydroelectric generation risk. Are there strong examples of risk management plans that LSES already provide publicly in relation to other topics or purposes,

for which the approaches could be helpful here?
Include citations, if possible.

20. Resource shuffling. Comment on the proposal to address the requirements of D.19-04-040 in relation to the potential for resource shuffling and recommend any areas for improvement.
21. Reliability assessment. Do you agree with the proposal to use the IEPR to apportion the planning targets for the proposed reliability standards? Indicate pros and cons of any suggested alternative methods.
22. Reliability assessment. Do you agree with the proposal for how to account for electric service providers as a group under the reliability assessments? Propose any alternatives and provide rationale.
23. Reliability assessment. Will LSEs be able to complete the “Example System Planning Capacity vs. Contracted and Planned Resources Table” without double counting resources? Explain.
24. Reliability assessment. Do you agree with the effective load carrying capacity assessment approach proposed under the system capacity requirement planning standard? Propose any alternatives and provide rationale.
25. Reliability assessment. What threshold should staff use to determine whether to conduct a loss-of-load expectation study on any specific year of an aggregated portfolio?
26. Reliability assessment. Comment on the LSE planning standard related to sufficient capacity in local capacity areas. Will it provide useful information for aggregation purposes? Propose any improvements.
27. Reliability assessment. Do you suggest any other reliability planning standards for LSE reporting? Describe analytical methods, necessary data, and modifications/improvements to existing tools to support the calculation. What additional information

would the proposed standard(s) provide when assessing reliability, both for assessing the contribution of individual LSEs to system reliability and in the assessment of aggregated portfolios?

28. Resource mix. Comment on the proposed planning standard for resource mix. Is there value in the LSEs reporting this standard? Suggest any improvements.
29. Resource oversubscription. Comment on the proposed requirement for LSEs to identify transmission capacity it will rely on for each zone. Can this reporting requirement improve LSE planning activities? Suggest any improvements.
30. Action plans. The requirements for LSE reporting on action plans remain fairly unchanged from the 2017-2018 cycle. Suggest any modifications or clarifications to requirements under this section.
31. Clean net short calculator tool. Comment on the proposed changes to the methodology and calculator tool. Are there other changes or modifications that should be considered?
32. Clean net short calculator tool. Because the calculator tool is designed to reflect California Independent System Operator (CAISO) operations, it may not be appropriate for California LSEs that do not serve load within the CAISO. What alternative means of estimating GHG emissions should those LSEs be required to use?
33. Clean net short calculator tool. In order to include the load-modifier toggle described in section 4.e.i.4., staff would need to obtain hourly data on load shapes for each year of the planning horizon, or at least for 2030. Where should this data be obtained? Are there other options for whether and how to incorporate such a feature?
34. Other. Comment on any other aspect of Section 4 of the staff proposal.

Other Questions

35. Bundled procurement plans. What modifications to the IRP process, if any, should the Commission make to facilitate coordination with investor-owned utility bundled procurement plans, required by Public Utilities Code Section 454.5?
36. Other. Provide any other additional comments and suggestions not already covered in the questions above.

IT IS RULED that:

1. Interested parties may file and serve opening comments on the attached Staff Proposal on Filing Requirements for the 2019-2020 Integrated Resource Plan Cycle, by answered the questions contained in this ruling, by no later than October 14, 2019.
2. Interested parties may file and serve reply comments by no later than October 25, 2019.

Dated September 20, 2019, at San Francisco, California.

/s/ JULIE A. FITCH
Julie A. Fitch
Administrative Law Judge